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From: HarborComments <HarborComments@epa.gov>
Sent: Tuesday, July 12, 2016 10:29 AM
To: PortlandHarbor
Subject: FW: Portland Harbor Draft Superfund Cleanup Plan

Laura Knudsen

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"Nothing great was ever achieved without enthusiasm" (Ralph Waldo Emerson)

Please Note: I am currently on detail to the EPA Region 10 office in Portland, Oregon until July 23, 2016.
 Thank you!



From: (b) (6)
Sent: Sunday, July 10, 2016 1:40 PM
To: HarborComments
Subject: Portland Harbor Draft Superfund Cleanup Plan

To the EPA:

I am disappointed in the EPA's failure to propose a significant cleanup of the Superfund site. The Draft fails fundamentally to protect human health in an effort to keep costs low. Specifically it relies too much on "monitored natural recovery," which in reality means leaving 86% of the site contaminated with PCBs, DDT, oil, and heavy metals to be slowly and incompletely covered by natural sediments. The cleanup plan should result in the removal of fish consumption advisories within a decade. This is a plausible measure of a cleanup that is designed to protect human health, and the plan should be revised to make this goal achievable. Dredging and toxic waste disposal should be more widely employed, but creating an in-river toxic waste disposal site seems to me to be an invitation to future disaster- through an extreme flooding event or earthquake- that would create a greater problem than now exists. Toxic sediments must be landfilled appropriately out of the river flood plain.

The Lower Willamette Group represents the entities most liable for comprehensive cleanup. They have pressured the EPA for a low cost strategy, and the draft plan appears to give them what they have demanded. The EPA does have a responsibility to consider costs, but the fundamental goal of a cleanup that protects human health, human communities, and wildlife cannot be sacrificed to short term economic demands. These companies are liable, and they must pay what is necessary.

Thank you for this opportunity to comment,

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